

Mr. Rodney Bryant  
VCP-CA Section, MC-221  
Remediation Division  
Texas Commission on Environmental Quality  
P. O. Box 13087  
Austin, Texas 78711-3087

**SUBJECT: VOLUNTARY CLEANUP PROGRAM (VCP)  
CES GRIGGS ROAD VCP SITE  
4900 GRIGGS ROAD, 4904 GRIGGS ROAD, AND 5910 WAYLAND STREET  
(VCP No. 2751; CN604824904; RN108370644)**

## **MONTHLY STATUS REPORT: NOVEMBER 2015**

Dear Mr. Bryant:

Pastor, Behling & Wheeler, LLC (PBW) is providing this monthly status report for the environmental assessment of the CES Griggs Road VCP Site (the Site) pursuant to the requirements of VCP Agreement No. 2751. The VCP Agreement was executed between the CES Griggs Road PRP Group and the Texas Commission on Environmental Quality (TCEQ) on June 10, 2015.

## **VCP ASSESSMENT ACTIVITIES CONDUCTED IN NOVEMBER 2015**

The following assessment activities occurred in November 2015:

1. Conducted twice weekly Site inspections. Security issues were not identified.
2. Updated the Site web page with the Historic Report Summary for 5910 Wayland Street and the TCEQ approval letter.
3. Prepared the Phase II sampling plan for the Site Affected Property Assessment.
4. Completed storm water pump down and off-site transport of water from the AST containment area. Based on results of analytical testing, the water was shipped as Class 2 non-hazardous waste.

## **VCP ASSESSMENT ACTIVITIES PLANNED FOR DECEMBER 2015**

The following assessment activities are planned for December 2015:

1. Conduct routine twice weekly Site inspections to monitor Site security.
2. Remove stormwater from the tank containments, if warranted.
3. Update the Site web page with the DSHS with the CES Environmental Services Community Services Fact Sheet.
4. Initiate the Phase II Affected Property Assessment.
5. Continue the preparation of the Affected Property Assessment Report (APAR).



## REQUEST FOR EXTENSION OF APAR

The CES Griggs Road PRP Group is requesting an extension of the December 31, 2015 APAR due date indicated in the VCP application. In order to complete the lateral assessment to the residential assessment level (RAL) and the vertical soil assessment, the Group is requesting an extension until March 31, 2016.

The affected property assessment was developed based on Site history, waste operations, and observations of waste storage during the September 2014 through June 2015 emergency removal actions. Soil borings were installed in the areas of waste handling and waste storage to determine the extent of potentially affected surface and subsurface soils. Soil borings in areas of potential releases from waste containers (such as totes, drums, roll-offs, frac tanks, tanks, etc.) or waste treatment units (such as the wastewater treatment plant) were drilled to approximately 15 feet below ground surface (bgs). Soil borings in areas of potential for releases from subsurface features (such as sumps, underground storage tanks [USTs], or the oil/water separator) were drilled to evidence of saturation or to a maximum of 30 – 35 feet bgs. Six soil borings were located on the 5910 Wayland Street property, three soil borings were located on the 4900 Griggs Road lot, and 23 soil borings were located on the 4904 Griggs Road property. Three samples were collected from each boring based on photoionization detector (PID) readings or visual observations. All samples were analyzed for metals, semivolatile organic compounds (SVOCs), volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH).

Concentrations and sample detection limits (SDLs) for the soil samples were below the applicable RALs for the majority of analytes and locations. However, in a few locations concentrations of arsenic, manganese, vanadium, benzo(a)pyrene, and TPH exceeded the applicable RAL. It is unclear if these few metal exceedances are related to past Site activities or are associated with background concentrations. Additional on-site delineation to the RAL is planned. Except for select analytes, soil concentrations and SDLs were below the method quantitation limit (MQL) or background (30 TAC 350.51(m)) in the deeper soil samples. Additional vertical delineation to the MQL or background is planned in those areas where analyte concentrations exceeded the MQL or background.

Please do not hesitate to contact me at (832) 916-3691 if you have any questions or comments regarding this status report.

Sincerely,  
PASTOR, BEHLING & WHEELER, LLC



Brenda P. Basile, Ph.D.  
Senior Consulting Scientist

cc: Mr. Gary Moore, Environmental Protection Agency Region 6  
CES Griggs Road PRP Group